

S. LANE TUCKER
United States Attorney

JOSHUA A. TRAINI
MARIE C. SCHEPERLE
Assistant U.S. Attorneys
Federal Building & U.S. Courthouse
222 West Seventh Avenue, #9, Room 253
Anchorage, Alaska 99513-7567
Phone: (907) 271-5071
Fax: (907) 271-2344
Email: Josh.Traini@usdoj.gov
Email: Marie.Schepelre@usdoj.gov

Attorneys for Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

ESTATE OF JAYSON VINBERG, through
its personal representatives BECKY
VINBERG, ANTHONY FURIO, and
ESTHER FURIO,

Case No. 3:22-cv-00135-SLG

Plaintiff,

vs.

UNITED STATES OF AMERICA,

Defendant.

**UNITED STATES' REPLY TO OPPOSITION TO MOTION TO EXTEND TIME
TO COMPLY WITH THE COURT'S ORDER AT DOCKET 126**

The Court's Order at Docket 126 grants Plaintiff's Motion to Unseal at Docket 105.

The Government moved to extend the time in which to comply with the Court's order at Dkt. 127. The Government requested an extension of 30 days—to November 23, 2024—

to comply with the Court's order so that the Government may mitigate any harm to security measures caused by the order. Plaintiff opposed at Docket 130.

In opposing the Government's request to extend the time to comply with the Court's order, Plaintiff speculates, without any factual basis, that the Government is seeking to disregard the Court's order. Rather, as the Government asserted in its motion, it needed time to consult with the Navy and for the Navy to reconsider the security posture of the Detachment and take any appropriate mitigation steps, if necessary. *See* Dkt. 127 at 2. The Government specifically commented on the levels of review necessary. *Id.* Despite Plaintiff's unfounded assertions to the contrary, counsel for the Government was in active discussions with its client agency and those discussions have continued. The Navy continues to need the remaining time to implement any necessary changes, but the Government anticipates needing no further extensions beyond its requested date of November 23, 2024 to comply with the Court's order.

RESPECTFULLY SUBMITTED this 4th day of November 2024, in Anchorage, Alaska.

S. LANE TUCKER
United States Attorney

/s/ Joshua A. Traini
Assistant U.S. Attorney

/s/ Marie C. Schepeler
Civil Chief, Assistant U.S. Attorney
Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on November 4, 2024
a true and correct copy of the foregoing
was served electronically on the following:

Dylan L. Hitchcock-Lopez
Laura Fisher
Matthew Findley
Ashburn & Mason, P.C.
Attorney for Plaintiff

/s/ Joshua A. Traini
Office of the U.S. Attorney